### IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF MISSISSIPPI NORTHERN DIVISION

NATIONAL ASSOCIATION FOR THE ADVANCEMENT OF COLORED PEOPLE; MISSISSIPPI STATE CONFERENCE OF THE NATIONAL ASSOCIATION FOR THE ADVANCEMENT OF COLORED PEOPLE; JACKSON CITY BRANCH OF THE NAACP; DERRICK JOHNSON; FRANK FIGGERS; CHARLES TAYLOR; MARKYEL PITTMAN; CHARLES JONES; and NSOMBI LAMBRIGHT-HAYNES,

Plaintiffs,

v.

TATE REEVES, in his official capacity as Governor of the State of Mississippi; SEAN TINDELL, in his official capacity as Commissioner of Public Safety; BO LUCKEY, in his official capacity as Chief of the Mississippi Department of Public Safety Office of Capitol Police; MICHAEL K. RANDOLPH, in his official capacity as Chief Justice of the Mississippi Supreme Court; and LYNN FITCH, in her official capacity as Attorney General of the State of Mississippi,

Defendants.

Case No. 3:23-cv-272-HTW-LGI

NOTICE OF PROOF OF PUBLICATION TO JOHN AND JANE DOES 1-4 CONCERNING APPOINTMENT AS A SPECIAL TEMPORARY CIRCUIT JUDGE ON THE HINDS COUNTY CIRCUIT COURT

COME NOW the Plaintiffs, the National Association for the Advancement of Colored People; the Mississippi State Conference of the National Association for the Advancement of Colored People; Jackson City Branch of the National Association for the Advancement of Colored People; Derrick Johnson; Frank Figgers; Charles Taylor;

Markyel Pittman; Charles Jones; and Nsombi Lambright-Haynes, and, pursuant to Federal Rule of Civil Procedure 65(1), hereby file their Proof of Publication of the notice of the instant lawsuit and the relief requested by the Plaintiffs that was given to John and Jane Does 1-4. A copy of the Proof of Publication is attached hereto and incorporated herein.

This the 31<sup>st</sup> day of August, 2023.

Respectfully submitted this 26<sup>th</sup> day of May, 2023.

#### /s/ Mark H. Lynch

Eric H. Holder, Jr.,\* DC Bar # 303115 Carol M. Browner,\* DC Bar # 90004293 Megan A. Crowley,\* DC Bar # 1049027 Gary S. Guzy,\* DC Bar # 375977 Mark H. Lynch,\* DC Bar # 193110 Brenden J. Cline,\* DC Bar # 1021317 COVINGTON & BURLING LLP

One CityCenter 850 Tenth Street NW Washington, DC 20001 Tel: (202) 662-6000 Fax: (202) 662-6291 eholder@cov.com cbrowner@cov.com mcrowley@cov.com gguzy@cov.com

Counsel for NAACP

mlynch@cov.com

bcline@cov.com

\*Pro Hac Vice

#### /s/ Carroll Rhodes

Carroll Rhodes, Esq. MS Bar, # 5314 **LAW OFFICES OF CARROLL RHODES** 

POST OFFICE BOX 588 HAZLEHURST, MS 39083 Telephone: (601) 894-4323

Fax: (601) 894-1464 crhode@bellsouth.net

Janette Louard,\* OH Bar # 066257 Anthony Ashton,\* MD Bar # 9712160021 Joe R. Schottenfeld,\* DC Bar # 1735796 Evan Walker-Wells,\* NY Bar # 6050645 NATIONAL ASSOCIATION FOR

# THE ADVANCEMENT OF COLORED PEOPLE

4805 Mt. Hope Drive Baltimore, MD 21215 Tel: (410) 580-5777 Fax: (410) 358-9350 jlouard@naacpnet.org aashton@naacpnet.org jschottenfeld@naacpnet.org

Counsel for All Plaintiffs

<sup>\*</sup>Pro Hac Vice

## **CERTIFICATE OF SERVICE**

I hereby certify that on August 31, 2023, I electronically filed the foregoing Motion with the Clerk of the Court by using the Court's PACER/CM/ECF system, which will send a notice of electronic filing to all counsel of record.

/s/ Carroll Rhodes Carroll Rhodes